

DEPARTMENT OF AGRICULTURE, TRADE AND CONSUMER PROTECTION

Veterinary Examining Board

March 25, 2020

A Reminder of VCPR Requirements in Wisconsin

The Food and Drug Administration indicated it is <u>not enforcing federal requirements</u> for a veterinarian-client-patient relationship (VCPR) when prescribing <u>extralabel drug use in animals</u> and <u>veterinary feed directive</u> <u>drugs</u>. However, in this situation, state laws on VCPRs supersede federal regulations.

Wisconsin requires a physical exam of an animal, or timely visits to the premises, to establish a VCPR. State law also requires a valid VCPR to prescribe medications, including drugs for extra label use and drugs used in feed. In Wisconsin, the criteria for a valid VCPR is set by statute and cannot be waived by the Veterinary Examining Board (VEB). That said, there is no statutory or administrative rule that sets a time frame on frequency of physical exams, or visits to the premises, to maintain a valid VCPR. Given the current circumstances, you should use sound judgement when determining whether a physical exam is necessary based on the medical concern, and what is appropriate based on that concern (assuming there is an established VCPR based on a prior exam or visit to the premises).

The VEB understands these are extraordinary times and that the health of our animals and the public are our primary focus. We encourage you to act in medically responsible ways during this time to provide the needed services, and be sure to document all treatment and circumstances in your records. The current situation will be taken into consideration if there is any future review of the action by the board.

For the latest on the COVID-19 pandemic:

- <u>See FAQs</u> from the Department of Agriculture, Trade and Consumer Protection (scroll down to the Animal Health tab).
- Visit the State of Wisconsin webpage offering resources and guidance from various agencies.

